

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**DOCKET NO. 2019-281-S**

IN RE:

APPLICATION OF PALMETTO UTILITIES,  
 INC. FOR AN INCREASE OF RATES AND  
 CHARGES FOR THE PROVISION OF  
 SEWER SERVICE AND MODIFICATIONS  
 TO CERTAIN TERMS AND CONDITIONS  
 OF THE PROVISION OF SEWER SERVICE

**SOUTH CAROLINA DEPARTMENT  
 OF CONSUMER AFFAIRS' FIRST  
 REQUEST FOR PRODUCTION TO  
 PALMETTO UTILITIES, INC.**

Pursuant to S.C. Code Ann. Regs. 103-833(C), the South Carolina Department of Consumer Affairs (the "Department"), by and through its undersigned counsel, hereby submits this First Request for Production to Palmetto Utilities, Inc. (the "Company") Pursuant to South Carolina Rule of Civil Procedure 26(e), each request is continuing until the time of the hearing such that the Company must promptly transmit to the Department the requested information as it becomes available. Please forward to the undersigned, via email, your first iteration of responses to the following request on or before Monday, March 23, 2020:

- 1-1 Please provide a copy of the unredacted application the Company filed in the above-referenced docket.
- 1-2 Please provide the curriculum vitae or resume showing all qualifications, employment history, previous witness experience, and publications of all witnesses whom the Company intends to use as a witness at the hearing in this case.
- 1-3 Please provide detailed work papers—in original MS Excel format with intact formulas and links—supporting the Company's application, including any amendments.
- 1-4 Please provide a copy of the map depicting the Company's current service area and the most recent Annual Report that were referenced in the Company's amended application

(para. 8, pp. 3-4), electronically filed December 20, 2019, and indicated as being on file with the Public Service Commission.

- 1-5 Please provide a copy of the settlement agreement referenced in the Company's amended application (para. 13, p. 7), electronically filed December 20, 2019.
- 1-6 Please provide supporting documents identified in response to Interrogatory 1-2(a).
- 1-7 Please provide supporting documents identified in response to Interrogatory 1-2(b).
- 1-8 Please provide a copy of all questions or information requests submitted to the Company by other parties, including the Office of Regulatory Staff ("ORS").
- 1-9 Please provide copies of all Company responses, including all supporting documents and workpapers, to the questions or information requests referenced in 1-8 above.
- 1-10 Please provide detailed work papers and Excel files-with intact formulas and links identified in response to Interrogatory 1-4.
- 1-11 Please provide detailed work papers and Excel files-with intact formulas and links identified in response to Interrogatory 1-5.
- 1-12 Please provide detailed work papers and Excel files-with intact formulas and links identified in response to Interrogatory 1-6.
- 1-13 Please provide any documents, records, or other information in any form referred to or relied upon in any of the Company's responses to the Consumer Advocate's First Set of Interrogatories.
- 1-14 Please provide a three-year monthly history for the most recent period available of each of the following, preferably in Excel format:
  - a. Number of sewer customers by class;
  - b. Billed sewer consumption by class; and
  - c. Total SFEs by class for sewer customers.

SIGNATURE ON FOLLOWING PAGE

South Carolina Department of Consumer Affairs

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March 3, 2020  
Columbia, South Carolina